



October 25, 2011

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: WC Docket No. 10-90; GN Docket No. 09-51; WC Docket  
No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92;  
CC Docket No. 96-45; WC Docket No. 04-36

Dear Ms. Dortch:

On Tuesday, October 25, 2011, Mike Rhoda (Windstream) and I spoke with Zac Katz (Office of Chairman Genachowski), Michael Steffen (Office of General Counsel) and Rebekah Goodheart (Wireline Competition Bureau) concerning an alteration that would be a workable change to a part of the mechanism proposed in the ABC Plan for creating an opportunity for companies to recover mandated reductions in access revenues. Under this approach, applicable to price cap carriers only, the opportunity for potential recovery would be limited to the revenue shift caused by mandated reductions in access charges less ten percent within study areas covered under the CALLS Order. For study areas not covered under the CALLS Order, the ten percent reduction would be delayed for five years.

Pursuant to Commission rules, please include a copy of this filing in each of the above-referenced dockets.

Sincerely,

Jonathan Banks

c: Zac Katz  
Michael Steffen  
Rebekah Goodheart